

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

AMF BOWLING CENTERS, INC.;	§	CIVIL ACTION NO. 3:23-cv-448
BOWLERO CORP.	§	
	§	
<i>Plaintiffs,</i>	§	
	§	
vs.	§	
	§	
THOMAS TANASE,	§	
	§	
<i>Defendant.</i>	§	

**NOTICE OF MOTION TO SEAL PORTIONS OF COMPLAINT, DECLARATION, AND
EXHIBITS TO DECLARATION IN SUPPORT OF PLAINTIFFS' MOTION FOR
TEMPORARY RESTRAINING ORDER AND PRELIMINARY INJUNCTION**

PLEASE TAKE NOTICE THAT, pursuant to Local Civil Rule 5 of the Local Rules of the United States District Court for the Eastern District of Virginia, Plaintiffs AMF Bowling Centers, Inc. and Bowlero Corp. (collectively, "Bowlero") have filed a Motion to Seal Portions of Complaint, Declaration, and Exhibits to Declaration in Support of Plaintiffs' Motion for Temporary Restraining Order and Preliminary Injunction ("Motion to Seal"). The specific grounds and authorities in support of the Motion to Seal are set forth in Bowlero's Memorandum in Support of the Motion to Seal.

Before this Court may seal Court documents, it must: (1) provide notice to the public and give the public an opportunity to object to the sealing; (2) consider less drastic alternatives; and (3) state specific findings in support of a decision to seal and reject alternatives to sealing. *See, e.g., Trustees of Columbia Univ. in City of N.Y. v. NortonLifeLock, Inc.*, 2021 WL 8895279 (E.D. Va. Sept. 29, 2021) (citing *Ashcraft v. Conoco, Inc.*, 218 F.3d 282, 288 (4th Cir. 2000)).

In compliance with Local Civil Rule 5 of the Local Rules of this Court and *Ashcraft*, the Court posts the following notice to the public: "This serves as public notice that Bowlero has

moved to file under seal portions of its Complaint, Declaration, and Exhibits to a Declaration in support of Plaintiffs' Motion for a Temporary Restraining Order and Preliminary Injunction. Parties and non-parties may submit memoranda in support of or in opposition to the Motion to Seal, and they may designate all or part of such memoranda as confidential. Any person objecting to the Motion to Seal must file an objection with the Clerk within seven (7) days and if no objection is filed in a timely manner, the Court may treat the Motion to Seal as uncontested. Objections to the Motion to Seal should be filed in the Civil Section of the Clerk's Office. The Notice will be posted for a minimum of forty-eight (48) hours."

Dated: July 12, 2023

Respectfully submitted,

/s/ Randy C. Sparks, Jr.

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*Counsel for Plaintiffs AMF Bowling
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CERTIFICATE OF SERVICE

I hereby certify that, on July 12, 2023, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will automatically send an email notification of such filing to all counsel of record who have filed an appearance. I also hereby certify that on July 13, 2023, I will send the foregoing via FedEx delivery to the following:

Thomas Tanase
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Defendant

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